

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JUL 12 2019

David J. Bradley, Clerk

United States of America  
v.Roberto Trevino-Mendoza  
YOB 1963  
Pedro Samuel Hernandez  
YOB 1986Case No. MA-19-1622-MDefendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 14 to March 26, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

Title 21, U.S.C. §§ 846,841(a)(1)

*Offense Description*Conspiracy to Possess with Intent To Distribute approximately three (3)  
kilograms of methamphetamine.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved:

Robert Wells, AUSA  
7/12/2019

Complainant's signature

Jose Peña Jr, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 12, 2019 3:33 pm

Judge's signature

City and state:

McAllen, Texas

Peter E. Ormsby, United States Magistrate Judge

Printed name and title

ATTACHMENT A

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

1. On February 14, 2019, FBI agents met with a Confidential Human Source (CHS) near the intersection of Conway Avenue and Griffin Parkway in Mission, Texas. FBI agents searched the CHS and the CHS's vehicle. The search was negative for contraband. FBI agents gave the CHS \$3,500 to conduct a controlled purchase of approximately one kilogram of methamphetamine. FBI agents followed the CHS to a residence located at 709 Nora Lane, Mission, Texas.

2. The CHS arrived at 709 Nora Lane and spoke to Roberto Trevino-Mendoza. During the meeting, Roberto Trevino-Mendoza interacted with the CHS. Also present at the residence with Trevino-Mendoza was Pedro Samuel Hernandez. Hernandez, who briefly interacted with the CHS from a distance, advised the CHS that the driver delivering the methamphetamine would be arriving shortly. Shortly thereafter, the methamphetamine arrived and it was handed over to Trevino-Mendoza. Trevino-Mendoza then got in the vehicle with the CHS turned over the methamphetamine in exchange for the \$3,500. The CHS did not know Hernandez by name but was shown a photograph of Pedro Samuel Hernandez, minus any identifiers and the CHS positively identified him as the individual also present with Trevino-Mendoza during the controlled purchase.

3. On March 8, 2019, FBI agents met with the CHS near the intersection of Conway Avenue and Griffin Parkway in Mission, Texas. FBI agents searched the CHS and the CHS's vehicle. The search was negative for contraband. FBI agents gave the CHS \$4,500 to conduct a controlled purchase of approximately one kilogram of methamphetamine. FBI agents followed the CHS to a residence located at 709 Nora Lane, Mission, Texas.

4. The CHS arrived at 709 Nora Lane and spoke to Trevino-Mendoza. During the meeting, Trevino-Mendoza advised the CHS that his connect to the delivery driver was

Pedro Samuel Hernandez. Shortly thereafter, the CHS observed Pedro Samuel Hernandez approaching 709 Nora Lane on foot, from a residence located at the corner of Nora Lane and Troster Road. The methamphetamine arrived and it was handed over to Trevino-Mendoza. Trevino-Mendoza then got in the vehicle with the CHS turned over the methamphetamine in exchange for the \$4,500. During this operation, Agents had aerial surveillance observed the individual walking towards 709 Nora Lane. FBI Agents confirmed the individual who delivered the methamphetamine returned to a residence located at 1513 Samantha Street in Mission, Texas.

5. On March 13, 2019, FBI agents were conducting surveillance at 1513 Samantha Street and observed an individual, believed to be the methamphetamine delivery driver, get into a vehicle and departed the residence. A traffic stop was conducted on the vehicle and approximately one kilogram of methamphetamine was seized. The driver (hereinafter "Individual 1") and sole occupant of the vehicle, waived his Miranda warnings and provided information about the pending transaction.

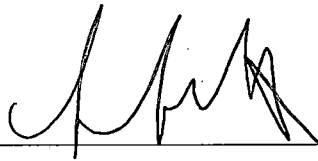
6. Individual 1 advised FBI agents that he/she was delivering the methamphetamine to a house on Nora Lane off of Troster Road and that an individual known to him/her as "Chisquis" coordinated the sale. Individual 1 did not know "Chisquis" true name. Individual 1 subsequently provided a photograph of the individual known to him as "Chisquis" and FBI Agents confirmed that person to be Pedro Samuel Hernandez.

7. On March 13, FBI Agents recorded a conversation where Trevino-Mendoza and Hernandez were discussing what they believed happened to Individual 1, who was set to deliver the methamphetamine to them. During that conversation, Hernandez whose identity was unknown to FBI Agents at that time, described how Individual 1 had picked up a police "tail."

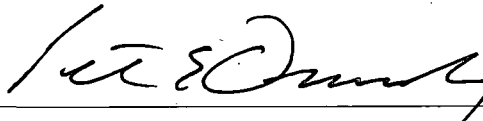
8. On March 22, 2019, Individual 1 made a phone call to Pedro Samuel Hernandez while in the presence and at the direction of FBI Agents. The phone call was audio recorded.

During the phone call, Individual 1 and Pedro Samuel Hernandez briefly discussed the events of March 13 when Individual 1 was pulled over by law enforcement and Individual 1 advised Hernandez he/she had to get rid of the methamphetamine because of law enforcement. At no time did Hernandez sound confused as to what Individual 1 was referring to related to the drug seizure. The voice of the audio recording on March 13 and March 22 was the same voice confirming Hernandez's participation.

9. During late March, FBI Agents received information from CHS2 that Trevino-Mendoza had a new methamphetamine supplier. On March 26, 2019, Hernandez and Trevino-Mendoza were arrested by Officers from the Mission Police Department. They were both pulled over while in Trevino-Mendoza's vehicle. A subsequent search of the vehicle resulted in the seizure of 31.1 grams of cocaine and 4.3 grams of methamphetamine.



Special Agent Jose Peña Jr  
Federal Bureau of Investigation



THE HONORABLE PETER ORMSBY  
UNITED STATES MAGISTRATE JUDGE